

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

FILED
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U.S. DISTRICT COURT
DISTRICT OF MASS.

UNITED STATES OF AMERICA

v.

FRANCIS WHITE

Criminal No. 03-CR-10356-MLW

**MOTION TO MODIFY TERMS OF
PRETRIAL RELEASE**

Defendant Francis White respectfully requests that this Court modify the terms of his pre-trial release. In support, Mr. White states as follows:

1. Under the current terms of his release, Mr. White is not permitted to leave the Commonwealth of Massachusetts without the prior approval of this Court.
2. As described in earlier pleadings, Mr. White has a very close relationship with his teenage son Alex. Mr. White spends considerable amounts of time with Alex, particularly during weekends, holidays and summer vacations.
3. Mr. White's cousins and Alex's uncle own homes in New Hampshire and Maine. Mr. White wishes to travel to these locations, as well as locations throughout New England, with his son during the upcoming summer vacation.

4. Since he has been released on bail, Mr. White has met each and every condition imposed upon him, and he will continue to do so for the duration of this case.
5. As this Court may recall, it previously found that Mr. White is **not** a flight risk. Since that time, there has not been any change in circumstances that would warrant a different conclusion, and there is no reason to believe that Mr. White would not return to Massachusetts to face the charges against him.

WHEREFORE, Mr. White respectfully requests that this Court grant his Motion to Modify Terms of Pretrial Release to allow him to travel throughout New England without prior Court approval.

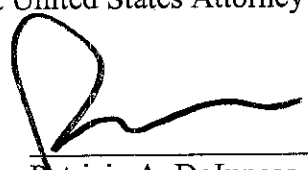
RESPECTFULLY SUBMITTED,
FRANCIS WHITE

By  attorneys,

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CERTIFICATE OF SERVICE

I, Patricia A. DeJuneas, hereby certify that I have caused a copy of the foregoing document to be served on Assistant United States Attorney Colin Owyang by first class mail, this 7th day of June, 2004.


Patricia A. DeJuneas